

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

U.S. DISTRICT COURT  
DISTRICT OF N.H.  
FILED

SAM SLOAN

Plaintiff(s)

2016 FEB -9 P 3:48

v.

Case No. 1:16-cv-52-

HEARST MEDIA CORPORATION, WMUR TV STATION  
Defendant(s)  
DEBORAH WASSERMAN SCHULTZ

MOTION TO/FOR TEMPORARY ORDER REQUIRING  
(enter title of motion)

WMUR TV STATION TO CARRY MEDIA  
ADVERTISEMENTS ADVOCATING SAM SLOAN  
FOR PRESIDENT OF THE UNITED STATES

SAM SLOAN, THE PLAINTIFF HEREIN,

1. I AM A DEMOCRATIC PARTY CANDIDATE  
FOR PRESIDENT OF THE UNITED STATES.  
MY NAME IS ON THE PRIMARY BALLOT  
FOR THE NEW HAMPSHIRE PRIMARY BEING  
HELD TODAY.

(Attach additional sheets if necessary)

Date: Feb 9, 2016

  
\_\_\_\_\_  
Signature

### MEMORANDUM OF LAW

Pursuant to LR 7.1(a)(2), every motion shall be accompanied by a memorandum with citations to supporting authorities or a statement explaining why a memorandum is unnecessary.

- ☐ I have attached a supporting memorandum of law to this motion.
- ☐ I have NOT attached a memorandum of law because none is required (explain your reasoning below).

### CONCURRENCES SOUGHT

Pursuant to LR 7.1(c), any party filing a motion other than a dispositive motion (a dispositive motion seeks an order disposing of one or more claims in favor of the moving party, for example, a motion to dismiss or a motion for summary judgment) shall certify to the court that a good faith attempt has been made to obtain concurrence/agreement in the relief sought. If concurrence is obtained, the moving party shall so note.

I certify the following (choose one):

- ☐ All parties have assented/agreed to this motion.
- ☐ I made a good faith attempt, but was unable to successfully obtain concurrence/agreement from all parties.
- ☐ I have NOT attempted to obtain concurrence/agreement because it is not required.

Date: Feb 9, 2016

  
Signature

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CERTIFICATE OF SERVICE

I hereby certify that this motion was served on the following persons on the date and in the manner specified below:

Person(s) served electronically (via ECF):

--

Person(s) served by mail. Please include address(s):

--

Person(s) served by hand:

--

Date of Service: \_\_\_\_\_

\_\_\_\_\_  
Signature

Name: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_  
Phone: \_\_\_\_\_

Email: \_\_\_\_\_

2. I HAVE PREPARED 16 COMMERCIAL QUALITY TV ADS FOR PAID ADVERTISING WHICH I HAVE ASKED TO BE BROADCAST ON WMUR TV in MANCHESTER NEW HAMPSHIRE. I AM WILLING TO PAY AND EXPECT TO PAY THE SAME AMOUNT THAT THE OTHER DEMOCRATIC PARTY CANDIDATES, BERNIE SANDERS AND HILLARY CLINTON ARE PAYING

3. ~~6~~ I HAVE REPEATEDLY CONTACTED OR ATTEMPTED TO CONTACT WMUR TV STATION ASKING THEM TO PLAY MY ADS. THEY HAVE FAILED AND REFUSED TO DO SO.

4. ALL 16 OF MY MEDIA ADS ARE NOW AVAILABLE ON MY FACE BOOK PAGE

5. LAST WEEK I WAS IN DES MOINES IOWA TO PARTICIPATE IN THE IOWA CAUCUSES. THE TV STATION IN DES MOINES IOWA IS ALSO OWNED BY HEARST MEDIA, THE SAME COMPANY THAT OWNS THE TV STATION IN MANCHESTER NH.
6. THERE I ALSO ASKED THAT MY TV ADS BE PLAYED, THEY REFUSED. THE GENERAL COUNSEL WROTE ME A LETTER SAYING THAT THEY WOULD NOT BROADCAST OR CARRY MY ADS UNLESS THEY COULD ESTABLISH THAT I WAS A "BONA FIDE" CANDIDATE FOR US PRESIDENT.

7. I AM A BONA FIDE CANDIDATE AS I AM REGISTERED WITH THE FEDERAL ELECTION COMMISSION. AS A CANDIDATE FOR PRESIDENT, I HAD BEEN INVITED TO PARTICIPATE IN THE IOWA CAUCUSES BY DR. ANDY MCGUIRE CHAIRMAN OF THE IOWA DEMOCRATIC PARTY ESPECIALLY SINCE MY FAMILY IS ORIGINALLY FROM IOWA. NEVERTHELESS THE TV STATION IN DES MOINES IOWA REFUSED TO CARRY MY ADS.
8. I AM AN INTERNALLY KNOWN AND FAMOUS CHESS PLAYER WHOSE NAME IS KNOWN TO MILLIONS OF CHESS PLAYERS AROUND THE WORLD THERE IS LITTLE DOUBT THAT I WOULD WIN THE PRIMARY ELECTION IF MY ADS WERE CARRIED

9. I AM AN ANTI-WAR CANDIDATE  
I WANT TO WITHDRAW ALL US  
TROOPS FROM THE MIDDLE EAST AND  
TO STOP THE US FROM BOMBING  
COUNTRIES AROUND THE WORLD. I  
WILL ALSO STOP THE US FROM  
PAYING ANY MONEY OR FINANCING  
ANY COUNTRIES WHO ARE ENGAGED  
IN WARS AROUND THE MIDDLE EAST.
10. I BELIEVE THAT A MAJORITY OF  
AMERICANS AGREE WITH ME AND  
THEREFORE I WOULD BE ELECTED  
IF MY CAMPAIGN ADS WERE  
BROADCAST AND MY VIEWS KNOWN



11. DEFENDANT DEBORAH WASSERMAN SCHULTZ IS CHAIRMAN OF THE DEMOCRATIC NATIONAL COMMITTEE. SHE IS ALSO THE FORMER CAMPAIGN MANAGER FOR HILLARY CLINTON. SHE HAS PROHIBITED ALL DEMOCRATIC PARTY CANDIDATES FROM PARTICIPATING IN THE DEBATES EXCEPT FOR HILLARY CLINTON AND BERNIE SANDERS. THIS IS THE REASON WHY THE GENERAL PUBLIC IS NOT AWARE THAT I AM A CANDIDATE. SHE SHOULD BE ORDERED BY THIS COURT TO INCLUDE ME IN ALL FUTURE DEMOCRATIC DEBATES.

WHEREFORE, AN ORDER SHOULD  
BE ISSUED BY THIS COURT  
REQUIRING WMUR TV STATION  
TO CARRY MY ADS TODAY FOR  
WHICH I WILL PAY THE SAME  
AMOUNT AS THE OTHER  
CANDIDATES AND

2. DEBORAH WASSERMAN SCHULTZ  
SHOULD BE ORDERED TO INCLUDE  
ME, SAM SLOAN, IN THE DEBATES

Sam Sloan

February 9, 2016